

**IN THE UNITED STATES DISTRICT
COURT FOR THE WESTERN DISTRICT
OF TEXAS SAN ANTONIO DIVISION**

LA UNION DEL PUEBLO ENTERO,
et al.,

Plaintiffs,

v.

GREGORY W. ABBOTT, et al.,

Defendants.

CIVIL ACTION NO. 5:21-CV-00844-XR
(Consolidated Cases)

**DISTRICT ATTORNEY OGG'S
OBJECTIONS TO PLAINTIFFS' DEPOSITION DESIGNATIONS**

Objections to HAUL and MFV Plaintiffs' Deposition Designations**1. Maria Gomez**

HAUL/MFV Plaintiffs' Designation	District Attorney Ogg's Objection(s)	District Attorney Ogg's Counter-Designations
15:25-16:8	FRE 801 et seq.	
29:4-5, 12-21	Speculation	
49:14-22	Speculation	

2. Yvonne Iglesias

HAUL/MFV Plaintiffs' Designation	District Attorney Ogg's Objection(s)	District Attorney Ogg's Counter-Designations
42:1-20	FRE 801 et seq.	
47:1-25	FRE 801 et seq.	

3. Jennifer Martinez

HAUL/MFV Plaintiffs' Designation	District Attorney Ogg's Objection(s)	District Attorney Ogg's Counter-Designations
52:1-18, 20-25	Speculation	
53:1-5, 13-22	Speculation	
67:4-17	Speculation	
72:11-21	Speculation	
74:4-11, 18-22	Speculation	
75:24-76:5	Speculation	
105:11-17	Speculation	107:4-22

4. Toby Cole

HAUL/MFV Plaintiffs' Designation	District Attorney Ogg's Objection(s)	District Attorney Ogg's Counter-Designations
20:4-21:4	Speculation	
21:21-22:24	Speculation; nonresponsive	
22:25-23:16	Speculation; lack of foundation; nonresponsive; FRE 401	
23:24-24:17	Speculation; nonresponsive	
29:1-30:5	Speculation	
43:4-12	Speculation; nonresponsive	

5. Jennifer Colvin

HAUL/MFV Plaintiffs' Designation	District Attorney Ogg's Objection(s)	District Attorney Ogg's Counter-Designations
68:4-16	Speculation	
85:10-86:16	FRE 801 et seq.	

6. Pamiel Gaskin

HAUL/MFV Plaintiffs' Designation	District Attorney Ogg's Objection(s)	District Attorney Ogg's Counter-Designations
21:17-25	FRE 801 et seq.	
22:1-21	FRE 801 et seq.	
49:1-19	Speculation	

7. Alan Vera

HAUL/MFV Plaintiffs' Designation	District Attorney Ogg's Objection(s)	District Attorney Ogg's Counter-Designations
144:24-145:6	FRE 801 et seq.	

8. Senator Carol Alvarado

HAUL/MFV Plaintiffs' Designation	District Attorney Ogg's Objection(s)	District Attorney Ogg's Counter-Designations
131:6-19	Speculation	
160:10-161:3	Lack of foundation; FRE 801 et seq.	

Objections to OCA Plaintiffs' Deposition Designations**1. Jennifer Colvin**

OCA Plaintiffs' Designation	District Attorney Ogg's Objection(s)	District Attorney Ogg's Counter-Designations
40:4-25	Speculation	
41:1-25	Speculation	
49:1-10, 17-25	Speculation	
62:13-24	Speculation	

2. Grace Chimene

OCA Plaintiffs' Designation	District Attorney Ogg's Objection(s)	District Attorney Ogg's Counter-Designations
108:1-25	Speculation	
109:1-2, 19-25	Speculation	
112:5-25	Speculation	
113:1-25	Speculation	
114:1-7	Speculation	
120:20-25	Speculation	
121:1-5	Speculation	
124:1-10, 17-25	Speculation	
125:1-2, 25	Speculation	
189:1-25	FRE 801 et seq.; speculation	
190:1-9, 14-25	Speculation	

3. Toby Cole

OCA Plaintiffs' Designation	District Attorney Ogg's Objection(s)	District Attorney Ogg's Counter-Designations
20:4-25	Speculation	
21:1-4, 21-25	Speculation	
22:1-25	Speculation	
23:1-16	Speculation; FRE 401	
29:1-25	Speculation	

4. Amatullah Contractor

OCA Plaintiffs' Designation	District Attorney Ogg's Objection(s)	District Attorney Ogg's Counter-Designations
19:21-25	Speculation	
20:1-2	Speculation	
20:6-19	Speculation	
20:20-24	Speculation	
27:7-25	Speculation	
28:1-9, 16-25	Speculation	
43:1-22	FRE 801 et seq.; Speculation	
45:1-6	Speculation	
46:21-24	Speculation	
47:6-20	Speculation	

52:1-21	FRE 801 et seq.	
56:16-25	Speculation	
57:1-11	Speculation	
65:5-8	Speculation	

5. Deborah Chen

OCA Plaintiffs' Designation	District Attorney Ogg's Objection(s)	District Attorney Ogg's Counter-Designations
68:1-25	Speculation; lack of personal knowledge	
75:6-24	Speculation; lack of personal knowledge	
76:6-25	Speculation; lack of personal knowledge	
77:1-25	Speculation; lack of personal knowledge	
79:15-22		79:23-25, 80:1-2
100:22-25	Speculation; lack of personal knowledge; narrative; nonresponsive	
101:1-25	Speculation; lack of personal knowledge; narrative; nonresponsive	
102:1-22	Speculation; lack of personal knowledge; narrative; nonresponsive	
109:1-25	FRE 801 et seq.	
110:1-4	FRE 801 et seq.; speculation; lack of personal knowledge	
115:18-116:1	Speculation; lack of personal knowledge; nonresponsive	
128:14-19		128:5-13
145:1		145:2-157:4
238:16-25	FRE 801 et seq.	
239:1-9	FRE 801 et seq.	
270:1-25	FRE 801 et seq.	
271:1-25	FRE 801 et seq.	
273:1-25	FRE 801 et seq.	

6. Pamiel Gaskin

OCA Plaintiffs' Designation	District Attorney Ogg's Objection(s)	District Attorney Ogg's Counter-Designations
21:1-25	FRE 801 et seq.	
22:1-5, 6-25	FRE 801 et seq.	
23:1-21	FRE 801 et seq.	
26:2-7	FRE 801 et seq.	
30:8-19	FRE 801 et seq.	
31:17-25	FRE 801 et seq.	
33:1-2, 25	FRE 801 et seq.	
48:23-25	Speculation; lack of personal knowledge	
49:1-25	Speculation; lack of personal knowledge	
50:1-25	Speculation; lack of personal knowledge	
51:1-8	Speculation; lack of personal knowledge	

7. Bob Kaska

OCA Plaintiffs' Designation	District Attorney Ogg's Objection(s)	District Attorney Ogg's Counter-Designations
27:1-9, 21-25	Speculation	
48:1-25	FRE 801 et seq.	
49:1-7	FRE 801 et seq.	
52:8-25	Speculation	
53:1-25	FRE 801 et seq.; speculation	
86:2-21	Speculation	
95:18-25	FRE 801 et seq.	
102:15-22	Speculation	
110:14-25	Speculation	

8. Roberto Benavides

OCA Plaintiffs' Designation	District Attorney Ogg's Objection(s)	District Attorney Ogg's Counter-Designations
27:1-25	FRE 801 et seq.	
28:1-7	FRE 801 et seq.	
31:9-25	FRE 801 et seq.	
33:19-25	FRE 801 et seq.	
34:1-25	FRE 801 et seq.	

44:1-25	Nonresponsive	
45:1-14, 16-25	Nonresponsive	
48:1-16	FRE 801 et seq.	

Objections to DOJ's Deposition Designations

1. Isabel Longoria (4/20/2022)

DOJ's Designation	District Attorney Ogg's Objection(s)	District Attorney Ogg's Counter-Designations
127:13-128:17	FRE 801 et seq.; speculation	

2. Isabel Longoria (4/20/2022) Vol. 1

DOJ's Designation	District Attorney Ogg's Objection(s)	District Attorney Ogg's Counter-Designations
40:21-41:12	FRE 801 et seq.; speculation	
41:13-44:7	Speculation	
56:3-57:9	FRE 801 et seq.	
61:4-64:13		

3. Roberto Benavides

DOJ's Designation	District Attorney Ogg's Objection(s)	District Attorney Ogg's Counter-Designations
26:8-27:11	FRE 801 et seq.	
27:12-24	FRE 801 et seq.	
27:25-28:7	FRE 801 et seq.	
33:24-35:2	FRE 801 et seq.	
42:22-45:13	Nonresponsive	
45:16-46:19	Nonresponsive	
48:4-50:4	FRE 801 et seq.	

4. Pamiel Gaskin

DOJ's Designation	District Attorney Ogg's Objection(s)	District Attorney Ogg's Counter-Designations
20:22-24:6	FRE 801 et seq.	
31:16-33:2	FRE 801 et seq.	
41:24-42:23	Speculation	
48:18-49:8	Speculation	24:4-10